



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Mr. Randy Martin
Industrial Safety and Environmental Services, Inc.
30723 Old US Highway 20
Elkhart, IN 46514

Re: Response to Review Request
No. 141-17346-00058
Permit Status Evaluation
Mohawk Flush Door, Inc.
141-00058

Dear Mr. Martin:

Industrial Safety and Environmental Services, Inc. submitted a review request on behalf of Mohawk Flush Door, Inc. located at 402 N. Sheridan, South Bend, IN 46619 on May 27, 2003. The letter was submitted to determine if Mohawk Flush Door, Inc., a wood door manufacturing plant operating under a Part 70 permit, was eligible for Permit by Rule status pursuant to 326 IAC 2-10.

The criteria to operate under the Permit by Rule provisions (326 IAC 2-10) are as follows:

- (a) The source's total actual emissions for every 12-month period shall be limited to less than 20% of any threshold for the following:
 - (1) A major source of regulated air pollutants.
 - (2) A major source of hazardous air pollutants, as defined in Section 112 of the Clean Air Act. [326 IAC 2-10-3(1)]
- (b) The source shall not rely on air pollution control equipment to comply with the above-mentioned limitations. [326 IAC 2-10-3(2)]

- (c) Not later than thirty (3) days after receipt of written request by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), or U.S. Environmental Protection Agency (EPA), the owner or operator shall demonstrate that the source is in compliance with the above-mentioned conditions. [326 IAC 2-10-4]
- (d) The compliance demonstration shall be based on actual emissions for the previous 12 months and may include, but is not limited to, fuel or material usage or production records. No other demonstration of compliance shall be required. [326 IAC 2-10-4]

If a source can comply with the above-mentioned provisions of 326 IAC 2-10, they are eligible for Permit by Rule status. Permit by Rule approval does not relieve the source of the responsibility to comply with the provisions of any applicable federal, state, or local requirements, such as New Source Performance Standards (NSPS), 40 CFR Part 60, or National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 61.

Our records indicate that the woodworking operations at Mohawk Flush Doors, Inc. is controlled by a cyclone/baghouse system, identified as DC1 and exhausting to stack DCX. There is no indication of a decision by the OAQ that this control equipment is considered integral to the process. Additionally, Mohawk Flush Door, Inc. operates particulate control equipment in conjunction with various spray booth operations.

Based on this preliminary evaluation, Mohawk Flush Door, Inc. is not eligible for Permit by Rule status. If the source requires a definite decision to be made by the IDEM OAQ, a letter requesting Permit by Rule status and revocation of the current operating permit should be sent to the IDEM OAQ.

Questions should be directed to Mack Sims, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 851-6027, press 0 and ask for Mack Sims or extension (3-0768) or dial (317) 233-0768.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

SIMS

cc: File - St. Joseph County
St. Joseph County Health Department
Air Compliance Inspector - Rick Reynolds
Northern Regional Office
Permit Administration - Delisa Lee
Technical Support and Modeling - Michele Boner